

Mr. Kevin W. Bons, OSB #066963
kbons@beckley-law.com
BECKLEY & BONs, P.C.
66 Club Road, Suite 360
P.O. Box 11098
Eugene, OR 97440
Phone: 541-683-0888
Fax: 541-683-0889

Attorney for Defendant Christine DeNoyo

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

JAMES BURT, an individual,)
) Case No. 6:14-cv-01098-AA
Plaintiff,)
) DECLARATION OF KELLY R.
v.) BECKLEY IN SUPPORT OF
) DEFENDANT'S MOTION FOR AN
CHRISTINE DENOYO, an individual,) AWARD OF ATTORNEY FEES
)
Defendant,)
)
and)
)
KEY TRADING LLC, a Delaware limited)
liability company; RAFAEL DENOYO, an)
individual; DAVID SULLIVAN, an)
individual; PETER LARKIN, an individual,)
)
Judgment Defendants.)

Kelly R. Beckley declares as follows:

1. I am a former shareholder in the firm of Beckley & Bons, P.C., in Eugene, Oregon.

DECLARATION OF KELLY R. BECKLEY IN SUPPORT OF DEFENDANT'S MOTION FOR AN AWARD OF
ATTORNEY FEES - Page 1

I have practiced law for 42 years and am admitted to practice in the Supreme Court of the United States, the Ninth Circuit Court of Appeals, United States District Court for the District of Oregon, United States Tax Court, Court of Appeals for the Armed Forces, Oregon Supreme Court and all inferior Oregon courts. My practice areas have included state and federal criminal defense, civil and general business litigation, and estate planning. My practice has an emphasis in litigation in which I have substantial expertise. A copy of my complete *curriculum vitae* is attached hereto as Exhibit "1".

2. I have reviewed the rates set forth in the Oregon State Economic Survey dated 2012.

3. I am familiar with the billing rates in my firm as well as other law firms in this legal market. In my opinion, lawyers with similar experience and qualifications to that of Kevin W. Bons and Jeffrey Trautman in the Eugene/Salem, Oregon area charge rates between \$275.00 and \$325.00 per hour.

4. I have reviewed the pleadings and other pertinent documents in this matter and am familiar with the reputation and experience of Mr. Kevin Bons.

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DECLARATION OF KELLY R. BECKLEY IN SUPPORT OF DEFENDANT'S MOTION FOR AN AWARD OF ATTORNEY FEES - Page 2

5. In my opinion, the rates proposed by Mr. Kevin Bons and Mr. Trautman are reasonable and consistent with those prevailing in the Eugene/Salem, Oregon area. Given the circumstances of this case, a reasonable award of attorney fees and expenses in this matter would be in the range of \$76,202.50 to \$90,155.00.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED this 27th day of December, 2016.

By: /s/ Kelly R. Beckley
Kelly R. Beckley, OSB No. 740317

DECLARATION OF KELLY R. BECKLEY IN SUPPORT OF DEFENDANT'S MOTION FOR AN AWARD OF ATTORNEY FEES - Page 3

CURRICULUM VITAE
of
KELLY R. BECKLEY

EDUCATION

- Washington State University, B.A. Political Science *with honors*, 1971
- University of Oregon School of Law, Juris Doctor, 1974

PRACTICE HISTORY

- United States Air Force: Judge Advocate General Department (active duty: 1974-1979) (Reserve: 1979 - 2004)
 - Vandenberg Air Force Base, CA: Prosecutor and Chief, Civil Law (1974-1976)
 - Ramstein Air Base, Germany: Prosecutor, Chief, Foreign Criminal Jurisdiction, and United States State Department Foreign Criminal Trial Observer (1976-1979)
 - Served as Staff Judge Advocate (Chief Lawyer) for various units from Group, Wing, and Numbered Air Force (1980-2004)
 - Served as the Senior Reserve Judge Advocate at the United States European Command Headquarters (1999-2004) Retired in the grade of Colonel (2004)
- Private Practice, Eugene, OR: Federal criminal defense (1979-Present); and general business and civil litigation practice.

ADMISSIONS

- Supreme Court of the United States
- Ninth Circuit Court of Appeals
- United States District Court for the District of Oregon
- United States Tax Court
- Court of Appeals for the Armed Forces
- Oregon Supreme Court and all inferior Oregon courts

BAR MEMBERSHIPS

- American Bar Association
- Oregon State Bar
- Lane County Bar Association

BECKLEY & BONS, P.C.

ATTORNEYS AT LAW

66 CLUB ROAD, SUITE 360 - P.O. BOX 11098 EUGENE, OR 97440-3298

541-683-0888 - FAX 541-683-0889

www.beckley-law.com

PROFESSIONAL ORGANIZATIONS

- Lawyer Representative to the Ninth Circuit Judicial Conference (2004-2006)
- Former Delegate, Oregon State Bar House of Delegates (1998-2000)
- Master Member and Executive Counsel Member, Roland K. Rodman American Inns of Court
- Former Member, Criminal Procedure Committee, United States District Court for the District of Oregon
- Life Member, Oregon Criminal Defense Lawyers Association
- Member, National Association Criminal Defense Lawyers

TEACHING

- University of Maryland, European Division, Instructor, Business Law (1977-1979)
- University of Oregon, School of Law, Instructor, Trial Practice Seminars (1992-1994)
- University of Oregon, School of Law, Guest Lecturer, White Collar Crime Seminars (2006, 2008, 2010)

RECENT PRESENTATIONS

- Event planner and moderator, O'Connell Conference: COME TOGETHER: Attorneys Teaching Judges (2005)
- Presenter, Cross Examination Techniques, Roland K. Rodman American Inns of Court (2006)
- Moderator, The Challenges of Legal Communications in the 21st Century, Federal Bar Association/ Lane County Bar Association (2007)
- Presenter, Interactive Courtroom Technology, Roland K. Rodman American Inns of Court (2008)

AWARDS

- 2009 *Eugene Register Guard* Readers' Choice Winner as the most effective attorney in Eugene/Springfield

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